

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT TAYLOR
P.O. BOX 12524
PHILADELPHIA , PA, 19151

Plaintiff/Petitioner
v.

CASE NO.
CIVIL ACTION NO: D-PAE-2-17-CV-003369-001
AND
CASE NO.
WRIT OF
HABEAS CORPUS NO. D-PAE-2-17-CV-003368-001

THE COMMONWEALTH
OF PENNSYLVANIA
COMMONWEALTH OF
PENNSYLVANIA DISTRICT
ATTORNEYS OFFICE
3 s. PENN SQUARE
PHILADELPHIA , PA ,19107

MOTION TO THE COURT

FILED SEP 27 2017

THE COMMONWEALTH COURT
PHILADELPHIA CRIMINAL
JUSTICE CENTER (CJC)
1301 FILBERT STREET
PHILADELPHIA, PA, 19107
AND
CURRENT OFFICIAL
JUDGE FRANK PALUMBO

COMPLAINT/PETITION
JURISDICTION

THE CITY OF PHILADELPHIA
C/O CITY OF PHILADELPHIA
LAW DEPARTMENT
1515 ARCH STREET, 14TH FLOOR
PHILADELPHIA, PA, 19102
AND
CURRENTLY CITY OF PHILADELPHIA
POLICE OFFICER O'BRIEN #7461
AND UNNAMED AND UNKNOWN
CITY OF PHILADELPHIA POLICE
OFFICERS

1. Jurisdiction Has Been Established
In Aforementioned Complaint/Petition
Case Number(s) In Caption Above.
This Motion Is Under Rules 3,4 (a) (1),
(b) (c) (3) And 7 (b) (1) Of The Federal
Rules Of Civil Procedure.

THE PHILADELPHIA PRISON SYSTEM/
DEPARTMENT OF PRISONS
CURRAN-FROMHOLD
CORRECTIONAL FACILITY (CFCF)
7901 STATE ROAD
PHILADELPHIA, PA, 19136
AND
CURRENTLY WARDEN GERALD MAY
AND PRISON OFFICIALS SGT.
LEBESCO AND C/O A. SMITH

THE PHILADELPHIA SHERIFFS OFFICE
LAND TITLE BUILDING
100 S. BROAD STREET
PHILADELPHIA, PA, 19110

THE PHILADELPHIA PUBLIC DEFENDERS
ASSOCIATION
1441 SAMSON STREET
PHILADELPHIA, PA, 19102
AND
CURRENTLY PUBLIC DEFENDER
CHRIS ANGELO

Defendant (s)

2. Plaintiff/Petitioner Brings Motion For Reissuance Of Summons Regarding His Action. As Well As Any Other Response And Instructions By The Court. This Is In Follow up To Previous Request For Reissuance Of Summons Submitted August 7, 2017. Sent On/Around August 9, 2017 To The Court.

3. On August 5, 2017 Plaintiff/Petitioner Received Mail Regarding His Case (s) From Office Of The Clerk U.S. District Court Eastern District Of Pennsylvania. Dated August 2, 2017 Which He Was Not Able To Verify Or Retain Due To Mail Tampering. Envelope Had Not Been Sealed And Was Taped Together.

4. Plaintiff/Petitioner Brought Immediate Notice To Post Office/Service Of His Mail. Officials Noted Damage And Took Mail For Immediate Return Back To The Court. There Was Also a Follow up To The Postal Inspection Service. Case No. CA134 282055 Regarding This Incident.

5. In Reference To Paragraphs 1-4 Above See Exhibit (A)

6. Plaintiff/Petitioner Since Has Not Had Response To His Summons Request Or Confirmation That The Previous Mail Dated August 2, 2017 Was Ever Returned Back To The Court.

7. Which Has Brought Forth This Motion. As Plaintiff/Petitioner Requires Issuance Of Summons To Continue The Process Of His Action. BOWLES v. DIXIE CAB ASS'N 113 F.SUPP. 324 (D.C. 1953). And Further Bring Forth The Facts Before The Court For Justice.

8. WHEREFORE, Plaintiff/Petitioner Request The Following:

a. Reissuance Of Summons.

b. Such Other Issuances Or Documents That May Have Been Sent By The Court.

RESPECTFULLY SUBMITTED

SEPTEMBER 26, 2017
DATE

Robert Taylor
ROBERT TAYLOR
P.O. BOX 12524
PHILADELPHIA, PA, 19151

BY THE COURT

**EXHIBIT
(A)**

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT TAYLOR
P.O. BOX 12524
PHILADELPHIA, PA, 19151

CASE NO. - CIVIL: D-PAE-2-17-CV-003369-001
WRIT OF HABEAS CORPUS: D-PAE-
2-17-CV-003368-001

Plaintiff/Petitioner in above caption filed civil lawsuit submitted July 26, 2017. Received by The Court July 28, 2017 while awaiting response on August 5, 2017 he received mail from office of clerk U.S. District Court Eastern District of Pennsylvania dated August 2, 2017 with numbers 02 1W 0001388268. Zip 19106-9865 Plaintiff/Petitioner could not get court response or verify what was contained in mail the envelope was not sealed and had been taped up appearing to be tampered with. Plaintiff/Petitioner immediately took mail to postal service officials attention who was unable to explain it and called for supervisor. After being brought this problem he only advised a mail fraud tampering claim could be done. The envelope was stamped received in damaged condition and was scheduled to be sent back. Due to this he has not gotten response of filing and action by THE COURT. Plaintiff/Petitioner urgently requests that confirmation and action regarding his filing be sent or resent by secure carrier from THE COURT to ensure proper reception or such other as THE COURT deems necessary.

AUGUST 7, 2017
DATE

Robert Taylor
ROBERT TAYLOR

PAUL RYAN
4410 PAUL ST
PHILADELPHIA
PA

19124-9998
4165660124

08/08/2017 (800)275-8777 9:51 AM

| Product Description | Sale Qty | Final Price |
|---------------------|----------|-------------|
|---------------------|----------|-------------|

| | | |
|----------|---|--------|
| PM 1-Day | 1 | \$6.65 |
|----------|---|--------|

Window FR Env
(Domestic)
(PHILADELPHIA, PA 19106)
(Flat Rate)
(Expected Delivery Day)
(Wednesday 08/09/2017)

Certified
(USPS Certified Mail #)
(701613700017769984)

| | |
|-------|---------|
| Total | \$10.00 |
|-------|---------|

| | |
|------|---------|
| Cash | \$10.00 |
|------|---------|

Includes up to \$50 insurance.

BRIGHTEN SOMEONE'S MAILBOX. Greeting cards available for purchase at select Post Offices.

Get your tracking number 24/7
(24/7) to get the
Standard Message
apply. You may also
USPS Tracking or call 1-800-222-1811

Save this receipt as evidence of
insurance. For information on filing
an insurance claim go to
<https://www.usps.com/help/claims.htm>

Order stamps at usps.com/shop or call
1-800-Stamp24. Go to
usps.com/clicknship to print shipping
labels with postage. For other
information call 1-800-ASK-USPS.

Get your mail when and where you want
it with a secure Post Office Box. Sign
up for a box online at
usps.com/poboxes.

All sales final on stamps and postage
Refunds for guaranteed services only
Thank you for your business

HELP US SERVE YOU BETTER

TELL US ABOUT YOUR RECENT
POSTAL EXPERIENCE

Go to:
<https://postalexperience.com/Post>

840-5196-0114-003-00010-07607-02

or scan this code with
your mobile device:



VERIFICATION

IN COMPLIANCE PURSUANT TO 28 U.S.C. § 1746 – UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY.

I verify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or verify under penalty of perjury that the foregoing document is true and correct."

Executed on

SEPTEMBER 26, 2017 Robert Taylor

DATE

ROBERT TAYLOR

CERTIFICATE

IN COMPLIANCE PURSUANT TO 28 U.S.C. § 1746 – UNSWORN
DECLARATIONS UNDER PENALTY OF PERJURY.

I certify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or certify under penalty of perjury that the foregoing is true and correct.

Executed on

SEPTEMBER 26, 2017

Robert Taylor

DATE

ROBERT TAYLOR

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FILED STAMP COPY REQUEST: Plaintiff/Petitioner Request a Filed Stamp Copy Of This Motion For Return By The Court. For This Plaintiff/Petitioner Has Sent An Enclosed Money Order, Additional Copies, And a Self Addressed Adhesive Seal Envelope.

SEPTEMBER 26, 2017
DATE

Robert Taylor
ROBERT TAYLOR

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Plaintiff(s)

v.

Defendant(s)) _____
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Civil Action No.

SUMMONS IN A CIVIL ACTIONTo: (*Defendant's name and address*)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk